

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF LEXI J. HAZAM IN
SUPPORT OF PLAINTIFF HARFORD
COUNTY BOARD OF EDUCATION
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
(HARFORD) (SD MSJ NO. 6)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF LEXI J. HAZAM

I, Lexi J. Hazam, declare:

1. I am a partner in the law firm of Lief, Cabraser, Heimann & Bernstein, LLP (“LCHB”), and serve as Court-appointed Co-Lead Counsel for the Personal Injury and School District Plaintiffs in this action. I have personal knowledge of the facts set forth in this Declaration, and, if called as a witness, could and would testify competently to them.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Harford County Board of Education Proposed Budget (Feb. 12, 2025), HCPS_00547101.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Deposition of Jack R. Smith, Ph.D., Exhibit 8.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Deposition of Jack R. Smith, Ph.D., Exhibit 10.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the 30(b)(6) Deposition Transcript of Bernard Hennigan (May 7, 2025).

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Fact Deposition Transcript of Sean Bulson, Ph.D. (May 9, 2025).

7. Attached hereto as **Exhibit 6** is a true and correct copy of Expert Report of Sharon Hoover, Ph.D. - Harford (May 18, 2025).

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Expert Report of Sharon Hoover, Ph.D. - Harford (May 18, 2025).

9. Attached hereto as **Exhibit 8** is a true and correct copy of the General Expert Report of Sharon Hoover, Ph.D. (May 16, 2025).

10. Attached hereto as **Exhibit 9** is a true and correct copy of the Harford 2023-2024 Wellness Needs Assessment, HCPS_00027780.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Student Cell Phones Strategic Focus Group Report, HCPS_00174744 (Aug. 15, 2023).

12. Attached hereto as **Exhibit 11** is a true and correct copy of the Email re: Cell Phone Policy Focus Groups, HCPS_00249296 (Apr. 27, 2023).

1 13. Attached hereto as **Exhibit 12** is a true and correct copy of the Expert Report of Robert Klein
2 - Harford (May 18, 2025).

3 14. Attached hereto as **Exhibit 13** is a true and correct copy of the Fact Deposition Transcript of
4 Sean Bulson, Vol. 2, Ex. 13 (May 15, 2025).

5 15. Attached hereto as **Exhibit 14** is a true and correct copy of the General Rebuttal Report of
6 Sharon Hoover, PhD (July 30, 2025). Filed under seal.

7 16. Attached hereto as **Exhibit 15** is a true and correct copy of the Fact Deposition of Bernard
8 Hennigan (May 7, 2025).

9 17. Attached hereto as **Exhibit 16** is a true and correct copy of the Dr. Dmitri Christakis Expert
10 Report - Redacted (May 15, 2025). Filed under seal.

11 18. Attached hereto as **Exhibit 17** is a true and correct copy of the Expert Report of Jean M.
12 Twenge, Ph.D. (highly confidential). Filed under seal.

13 19. Attached hereto as **Exhibit 18** is a true and correct copy of the Fact Deposition of Donovan
14 Brooks (May 8, 2025).

15 20. Attached hereto as **Exhibit 19** is a true and correct copy of the Deposition of Jillian Lader
16 (May 12, 2025).

17 21. Attached hereto as **Exhibit 20** is a true and correct copy of the Deposition of Jack R. Smith,
18 Ph.D. (Sep. 12, 2025). Filed under seal.

19 22. Attached hereto as **Exhibit 21** is a true and correct copy of the Expert Report of Jack R.
20 Smith, Ph.D. (Highly Confidential). Filed under seal.

21 23. Attached hereto as **Exhibit 22** is a true and correct copy of the Deposition of Jack R. Smith,
22 Ph.D., Ex. 16.

23 24. Attached hereto as **Exhibit 23** is a true and correct copy of the HCPS 2018-2019 Student
24 Handbook, HCPS_00055970.

25 25. Attached hereto as **Exhibit 24** is a true and correct copy of the HCPS Bullying Policy (2022),
26 HCPS_0033163.

27 26. Attached hereto as **Exhibit 25** is a true and correct copy of the HCPS PCD Policy (Mar. 18,
28 2024), HCPS_00122261.

27. Attached hereto as **Exhibit 26** is a true and correct copy of the Fact Deposition of Dwayne Edward Williams (May 5, 2025).

28. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts of the Asher Meyers Expert Report – Harford (May 19, 2025).

29. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts of the 30(b)(6) Deposition of Andrew (Drew) Moore (Mar. 14, 2025).

30. Attached hereto as **Exhibit 29** is a true and correct copy of the 30(b)(6) Deposition of Andrew Moore (May 29, 2025).

31. Attached hereto as **Exhibit 30** is a true and correct copy of Fact Deposition of Andrew (Drew) Moore (Mar. 14, 2025).

32. Attached hereto as **Exhibit 31** is a true and correct copy of the Expert Report of Dr. Bryce Ward – Harford (May 19, 2025).

I declare under penalty of perjury under the law of the State of California that the foregoing is true and correct.

Executed on November 7, 2025 in San Francisco, California.

Respectfully submitted,

By: /s/ Lexi J. Hazam

LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

Co-Lead Counsel